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13 IN THE UNITED STATES DISTRICT COURT  
14 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
15  
16 SAN FRANCISCO DIVISION

17  
18 UNITED STATES OF AMERICA,  
19 Plaintiff,  
20 v.  
21 DANILLO BUSTILLO-SEVILLA,  
22 Defendant.

23 Case No.: CR-20-00021-VC

24 MOTION TO CONTINUE ALL COURT  
25 APPEARANCES UNTIL AFTER MAY 1,  
26 2020

27 As of the date of this motion, the President has declared a national public health emergency,<sup>1</sup>  
28 and the Governor of the State of California has declared a public health emergency throughout the  
state,<sup>2</sup> both in response to the spread of the Coronavirus Disease 2019 (COVID-19). The Centers of  
Disease Control and Prevention (CDC) and other health authorities have advised people to take  
precautions to reduce the exposure to COVID-19 and to slow the spread of the disease. An important  
part of the CDC recommendations is social distancing: keeping an appropriate physical distance

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1 between people, and particularly in public settings.<sup>3</sup>

2 To ensure the health and safety of the defendant through social distancing, undersigned counsel  
3 hereby moves the Court to cancel all in-court hearings before May 1, 2020. Undersigned counsel  
4 further moves the Court to set the matter on for status on a date after May 1, 2020.

5 If videoconferencing becomes available before May 1, 2020, undersigned counsel preserves the  
6 right to move the Court to add the matter to the Court's calendar for a videoconference appearance.  
7 Defense counsel will work with government counsel to determine an acceptable date for any  
8 videoconference hearing.

9 Therefore, for the above reasons the defense moves the court to vacate all court proceedings,  
10 set a status hearing after the May 1, 2020 date, and to allow the parties to seek a hearing before that  
11 date if videoconferencing becomes available.

12  
13 Dated: March 15, 2020

Respectfully submitted,

14 STEVEN G. KALAR  
15 Federal Public Defender

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17 Northern District of California

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27 <sup>3</sup> See generally Centers for Disease Control and Prevention, *Coronavirus (COVID-19)*,  
28 https://www.cdc.gov/coronavirus/2019-ncov/index.html (updated frequently); California Dep't of  
Public Health, https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/Immunization/ncov2019.aspx  
(updated daily); see also Office of Governor, Executive Order N-25-20 (Mar. 12, 2020).